

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN – SOUTHERN DIVISION

PEARLIE JACKSON, Personal
Representative of the Estate of
Stanley Jackson,

Plaintiff,

vs.

Case No: 12-cv-10963
Honorable Denise Page Hood
Magistrate Judge Laurie J. Michelson

WASHTENAW COUNTY,
DEPUTY THOMAS MERCURE,
DEPUTY DEAN REICH,
DEPUTY SEAN URBAN,
DEPUTY HOLLY FARMER

Defendants.

**EX PARTE MOTION FOR LEAVE TO FILE
AUDIO/VIDEO RECORDING IN THE TRADITIONAL MANNER
BY DEFENDANTS**

NOW COME Defendants Washtenaw County, Deputy Sean Urban, Deputy Thomas Mercure, Deputy Holly Farmer and Deputy Dean Reich, through counsel Reach Law Firm, and pursuant to the Electronic Filing Policies and Procedures, seek leave of this Court to file **Exhibit 3 to Defendants' Motion for Summary Judgment (one DVD)** in the traditional manner.

Exhibit 3 cannot be converted to electronic filing form because it is an audio/video recording of live action sound and movements in the underlying incident.

For the foregoing reason, the undersigned respectfully requests that this Court grant the leave sought in this motion.

Date: October 1, 2013

s/Cynthia L. Reach (P55903)

Reach Law Firm
Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed “Motion for Leave to File Audio/Video Recording in the Traditional Manner” by Defendant Deputy Dalton, and file this Certificate of Service with the Clerk of the Court using the ECF system which will send notification of such filing to the following: Daniel G. Romano, Esq., and David G. Blake, Esq., and I hereby certify that I have mailed by U.S. Postal Service the paper to the following non-ECF participants: (none).

Date: October 1, 2013

s/Cynthia L. Reach (P55903)

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